



U.S. Department of Justice  
**United States Attorney's Office**  
Eastern District of Virginia

Jessica D. Aber  
United States Attorney

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March 11, 2022

Samuel J.B. Angell  
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Federal Community Defender Office  
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Joan C. Robin  
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Alexandria, VA 22314  
Email: joni@jonirobinlaw.com

Re: *United States v. Jorge Avila Torrez*, No. 1:11-cr-115 (LO)

Dear Mr. Angell:

This letter memorializes our eighth agreement regarding the filing of a motion for your client, Jorge Avila Torrez, pursuant to Title 28, United States Code, Section 2255.

Under Title 28, United States Code, Section 2255(f)(1), the deadline for your client to file his motion to vacate, set aside, or correct his sentence was on or before June 17, 2020, which was one-year following the date on which the judgement of his conviction became final. You previously represented to the government that the coronavirus pandemic and the resulting restrictions and closures have made it impossible for you and your staff to complete your work in preparing and filing your client's motion by this date.

Based upon these representations, by letter dated May 4, 2020 (Dkt. 488), the United States agreed to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before October 1, 2020. By letter dated August 28, 2020 (Dkt. 489), the United States agreed to extend our agreement and to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before January 15, 2021. By letter dated December 7, 2020 (Dkt. 494), the United States

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agreed to extend our agreement and to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before April 15, 2021. By letter dated March 26, 2021 (Dkt. 495), the United States agreed to extend our agreement and to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before June 16, 2021. By letter dated June 2, 2021 (Dkt. 496), the United States agreed to extend our agreement and to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before September 14, 2021. By letter dated September 10, 2021 (Dkt. 497), the United States agreed to extend our agreement and to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before December 13, 2021. By letter dated December 7, 2021 (Dkt. 498), the United States agreed to extend our agreement and to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before March 14, 2022.

As we discussed, the conditions created by the coronavirus pandemic have continued longer than we had anticipated. As a result, the United States agrees to waive any statute of limitations defense pursuant to Title 28, United States Code, Section 2255(f)(1), for any motion to vacate, set aside, or correct sentence filed on or before June 13, 2022.

As you requested, I will file this letter with the Clerk's Office through the Court's electronic filing system and will also send a copy to the Honorable Liam O'Grady, United States District Judge.

Sincerely,

Jessica D. Aber  
United States Attorney

By:

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